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November 9, 2000

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OFFICE OF THE SECRETARY

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Magalie R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**

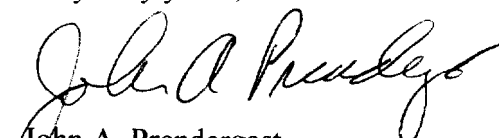
**Re: Brookings Municipal Utilities d/b/a Swiftel**  
**Implementation Plans of Wireless E911 Phase II Automatic**  
**Location Identification**  
**Notice Pertaining to CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of Brookings Municipal Utilities d/b/a Swiftel, we are submitting herewith its Report on Implementation of Wireless E911 Phase II Automatic Location Identification.

Please direct any questions or correspondence regarding this filing to our office.

Very truly yours,

  
John A. Prendergast  
D. Cary Mitchell

Attachment

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List ABCDE

**BROOKINGS MUNICIPAL UTILITIES d/b/a SWIFTEL**  
**525 Western Avenue**  
**Brookings, SD 57006**

Magalie R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**

**Re: Implementation Plans of Wireless 911 Phase II Automatic**  
**Location Identification**  
**Notice Pertaining to CC Docket No. 94-102**

**E911 PHASE II STATUS REPORT**

Dear Ms. Salas:

In accordance with the Third Report and Order in Docket No. 94-102 and the Commission's related Public Notice, Mimeo No. DA00-2099 (released September 14, 2000), we hereby submit our report on the status of implementation plans for Wireless 911 Phase II Automatic Location Information, as follows:

**Background/Contact Information**

- 1) Carrier Identifying Information: Brookings Municipal Utilities d/b/a Swiftel  
TRS Number: 806727
- 2) Contact Information: John Prendergast, Esq.  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037  
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**E911 Phase II Location Technology Information**

Response to Item Nos. 1 – 7, DA00-2099.

1. **Type of Technology:** Brookings Municipal Utilities d/b/a Swiftel (“Swiftel”) holds the licenses for Broadband Personal Communications Service stations WPOI260 (covering the Sioux Falls and Watertown SD BTAs, Block-A, partitioned from MTA012 as Submarket 2) and WPQL803 (covering the Sioux City IA BTA, Block-B, partitioned from MTA032 as Submarket 2). The five-year construction Benchmark for these licenses was June 23, 2000, and was met by Swiftel and the partitioner, WirelessCo, L.P., which is an affiliate of Sprint Spectrum L.P. d/b/a Sprint PCS (“Sprint PCS”). Swiftel operates these systems pursuant to an affiliation arrangement with Sprint PCS, and will take measures to achieve E911 Phase II compliance consistent with those taken by Sprint PCS. In this regard, Swiftel is adopting the Phase II compliance program which is being simultaneously reported by Sprint PCS (the “Sprint PCS Phase II Report”).

Swiftel’s systems utilize CDMA technology, and will use a handset solution to implement E911 Phase II capability. The details of this solution are described in the Sprint PCS Phase II Report. As noted therein, neither Sprint PCS nor Swiftel control the manufacture of the handsets and related interface equipment, and they are therefore dependent on their equipment vendors. The handset vendors include Denso, Kyocera, LGIC, Motorola, Neopoint, Nokia, Samsung and Sanyo. The base station/interface vendors include Lucent Technologies, Nortel, Samsung and Motorola. Swiftel and Sprint will be competing with other large carriers to obtain the equipment from these vendors needed to meet the Commission’s implementation benchmarks for a handset solution.

2. **Testing and Verification Method:** Testing to verify the compliance of the chosen Phase II capability has been conducted by Sprint PCS in conjunction with Lucent Technologies, and the results are described in the Sprint PCS Phase II Report. All future testing will be conducted in accordance with the Empirical Testing Method per OET Bulletin No. 71 and the equipment manufacturer’s requirements.
3. **Implementation Details and Schedule:** Swiftel will implement its Phase II solution consistent with the program and timetable set forth in the Sprint PCS Phase II Report. As noted therein, the unavailability of a sufficient number of compliant handsets and the conversion to third generation (“3G”) technologies may complicate the process of meeting the handset benchmarks. This is especially true for Swiftel, which is serving rural areas that may not be given the same priority as major metropolitan areas for purposes of handset distribution and network upgrades needed to process the Phase II information and deliver it to the PSAPs. Swiftel will make all reasonable efforts to meet the scheduled benchmarks.

4. **PSAP Interface:** The process to be used to interface with the relevant PSAPs is described in the Sprint PCS Phase II Report at Section 4. Swiftel notes that the PSAPs with a presence in our service areas have not to date requested Phase II capability, and many are not yet capable of utilizing Phase I data.
5. **Upgrading Existing Handsets:** Once the Phase II capability is implemented, it is contemplated that we will use customer mailings, bill inserts, store promotions and similar efforts to make our customers and potential customers aware of the availability and benefits of Phase II capability, and to encourage the upgrading of existing handsets. As noted in the Sprint PCS Phase II Report, the average customer already changes handsets every 18-21 months, for reasons unrelated to E911. This attrition rate should facilitate the replacement of non-compliant handsets.
6. **Location of Non-Compatible Handsets:** See Sprint PCS Phase II Report, Section 6.

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Swiftel is proceeding to implement E911 ALI Phase II in accordance with the Commission's Rules. We will remain in contact with our local PSAP, and as necessary will update this report to keep the Commission apprised of our progress.

Respectfully submitted,

**BROOKINGS MUNICIPAL UTILITIES**  
**d/b/a SWIFTEL**

By \_\_\_\_\_  
Duly Authorized Employee

Dated: November 9, 2000

Swiftel is proceeding to implement E911 ALI Phase II in accordance with the Commission's Rules. We will remain in contact with our local PSAP, and as necessary will update this report to keep the Commission apprised of our progress.

Respectfully submitted,

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By

  
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Dated: November 9, 2000